

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Danz, Emily	NY	USA	Danz, Vincent	Child	N/A
2	Danz, Winfred	NY	USA	Danz, Vincent	Child	N/A
3	Danz- Donohue, Angela	NY	USA	Danz, Vincent	Spouse	N/A
4	Danz- Donohue, Angela	NY	USA	Danz, Vincent	Parent and legal guardian on behalf of A.D., minor child of 9/11 Decedent Vincent Danz	N/A
5	Dean, Matthew	NY	USA	Dean, William	Child	N/A
6	Dean, Patricia	NY	USA	Dean, William	Spouse	N/A
7	Dean, Patricia	NY	USA	Dean, William	Parent and legal guardian on behalf of C. A. D., minor child of	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					9/11 Decedent William Dean	
8	Flyzik, Catherine	NH	USA	Flyzik, Carol	Personal Representative of the Estate of Mark Flyzik, deceased Sibling of 9/11 Decedent Carol Flyzik	N/A
9	Flyzik, Janet	NH	USA	Flyzik, Carol	Personal Representative of the Estate of Charles A. Flyzik, deceased Parent of 9/11 Decedent Carol Flyzik	N/A
10	Fontana, Aidan	NY	USA	Fontana, David J.	Child	N/A
11	Fontana, Marian	NY	USA	Fontana, David J.	Spouse	N/A
12	Gregory, John F.	NY	USA	Gregory, Florence M.	Personal Representative of the Estate of John Gregory, deceased Parent of 9/11 Decedent Florence M. Gregory	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
13	Gregory, John F.	NY	USA	Gregory, Florence M.	Personal Representative of the Estate of Florence Gregory, deceased Parent of 9/11 Decedent Florence M. Gregory	N/A
14	Lillo, Haydee C.	NY	USA	Lillo, Carlos	Spouse	N/A
15	McCraan, Derek A.	WA	USA	McCraan, Charles A.	Child	N/A
16	McCraan, Michelle	PA	USA	McCraan, Charles A.	Spouse	N/A
17	Rosenblum, Barbara	NY	USA	Rosenblum, Andrew I.	Personal Representative of the Estate of Jason Rosenblum, deceased Parent of 9/11 Decedent Andrew I. Rosenblum	N/A
18	Statkevicius, Kim	NC	USA	Statkevicius, Derek J.	Spouse	N/A
19	Statkevicius, Kim	NC	USA	Statkevicius, Derek J.	Parent and legal guardian on behalf of T. S., minor child of 9/11	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Decedent Derek J. Statkevics	
20	Statkevics, Kim	NC	USA	Statkevics, Derek J.	Parent and legal guardian on behalf of D. C. S., minor child of 9/11 Decedent Derek J. Statkevics	N/A
21	Trudel, Kimberly	MA	USA	Rimmele III, Frederick	Spouse	N/A
22	Velazquez, Consuelo	NJ	USA	Velazquez, Jorge	Spouse	N/A
23	Velazquez, Jr., Jorge	NJ	USA	Velazquez, Jorge	Child	N/A
24	Velazquez, Marilyn	NJ	USA	Velazquez, Jorge	Child	N/A
25	Velazquez, Steven	NJ	USA	Velazquez, Jorge	Child	N/A

Dated: November 28, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler
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